

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DARLENE SCHAEFER,

Plaintiff,

vs.

IC SYSTEM, INC.,

Defendant.

Case No. :17-cv-01920 (FB) (CLP)

**NOTICE OF MOTION FOR SUMMARY JUDGMENT PURSUANT TO FEDERAL
RULES OF CIVIL PROCEDURE 56(a)**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law dated April 3, 2019, the Statement of Facts dated April 3, 2019, the Declaration of Darlene Schaefer sworn to on April 3, 2019, the Declaration of Abel L. Pierre, Esq. dated April 3, 2019, and the exhibits annexed hereto, and all prior proceedings and pleadings herein, Plaintiff Darlene Schaefer will move this court before the Hon. Frederic Block, Senior Judge of the United States District Court for the Eastern District of New York, at the United States Courthouse 225 Cadman Plaza East, Brooklyn, New York 11201, Courtroom 324N, on a date and time as determined by the Court, for an Order:

- (a) Granting summary judgment to the Plaintiff pursuant to Fed. R. Civ. P 56(a);
- (b) For such other and further relief that the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that Plaintiff respectfully requests oral argument in connection with this motion.

Dated: April 3, 2019
New York, New York

Respectfully Submitted,

**LAW OFFICE OF ABEL L. PIERRE,
ATTORNEY-AT-LAW, PC**

A handwritten signature in black ink, appearing to read 'Abel L. Pierre Esq.', with a stylized flourish at the end.

Abel L. Pierre, Esq.
140 Broadway, 46th Floor
New York, New York 10005
Tel. No. (212) 766-3323
Fax No. (212) 766-3322
Attorneys for Plaintiff

To: Peter Schiaos, Esq.
Gordon & Rees, LLP
Attorneys for Defendant
18 Columbia Turnpike, Suite 220
Florham Park, NJ 07932
psiachos@gordonrees.com